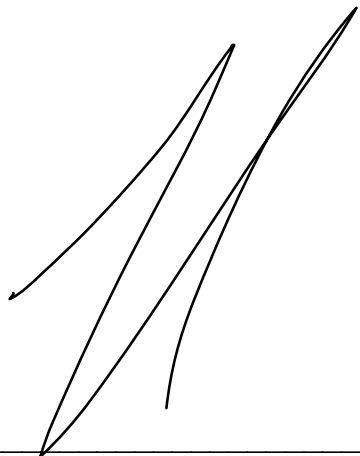




CERTIFICATE OF SERVICE

I, the undersigned attorney, do hereby certify that a true and correct copy of the foregoing document was forwarded to the following counsel of record on this the 13<sup>th</sup> day of December, 2013 via CM/ECF, pursuant to the Federal Rules of Civil Procedure:

Roerig, Olivera & Fisher, L.L.P.  
Jeffery D. Roerig  
David M. Roerig  
Rosemary Conrad-Sandoval  
10255 N. 10<sup>th</sup> Street  
McAllen, Texas 78504

  
\_\_\_\_\_  
JEFFREY L. RAIZNER

**(A) The name and, if known, the address and telephone number of each individual likely to have discoverable information relevant to disputed facts alleged with particularity in the pleadings, identifying the subjects of the information:**

**ANSWER:**

Veronica Olivarez  
Noel H. Olivarez  
c/o Doyle Raizner, LLP  
LyondellBasell Tower  
1221 McKinney, Suite 4100  
Houston, Texas 77010  
Ph. (713) 571 – 1146

Plaintiff and Plaintiff's husband who have knowledge regarding the facts and circumstances surrounding the happening, incident and/or occurrence made the basis of this suit.

Gonzalo Arevalo  
3120 N. Mayberry Rd.  
Mission, Texas 78573  
Ph. (956) 534-8543

Plaintiff's brother who has knowledge regarding the facts and circumstances surrounding the happening, incident and/or occurrence made the basis of this suit.

Juan Arevalo  
2114 Clavele St.  
Mission, Texas 78573  
Ph. (956) 391-7924

Plaintiff's brother who has knowledge regarding the facts and circumstances surrounding the happening, incident and/or occurrence made the basis of this suit.

Allstate Texas Lloyds  
c/o Roerig, Oliveira & Fisher, L.L.P.  
10225 N. 10<sup>th</sup> Street  
McAllen, Texas 78504  
Ph. (956)393-6300

Defendant who has knowledge regarding the facts and circumstances surrounding the happening, incident and/or occurrence made the basis of this suit.

Stephen Hadhazi  
c/o IntegraClaim  
3911 N. 10<sup>th</sup> Street  
Suite N  
McAllen, Texas 78501  
Ph. (956) 238-4700

Plaintiff's retained Public Adjuster who has knowledge regarding the facts and circumstances surrounding the happening, incident and/or occurrence made the basis of this suit.

Tom Irmiter  
Ryan Nierengarten  
Shawn Peatrowsky  
Forensic Building Science, Inc.  
595 Selby Avenue  
St. Paul, MN 55102  
Ph. (651) 222-6509

Plaintiff's retained expert, who has knowledge regarding the facts and circumstances surrounding the happening, incident and/or occurrence made the basis of this suit.

George E. Garcia  
Allstate Texas Lloyds  
c/o Roerig, Oliveira & Fisher, L.L.P.  
10225 N. 10<sup>th</sup> Street  
McAllen, Texas 78504  
Ph. (956)393-6300

George E. Garcia, insurance agent, who may have knowledge regarding the facts and circumstances surrounding the happening, incident and/or occurrence made the basis of this suit.

Janine Peden  
Allstate Texas Lloyds  
c/o Roerig, Oliveira & Fisher, L.L.P.  
10225 N. 10<sup>th</sup> Street  
McAllen, Texas 78504  
Ph. (956)393-6300

Janine Peden, claims handling representative for Allstate Texas Lloyds, who has knowledge regarding the facts and circumstances surrounding the happening, incident and/or occurrence made the basis of this suit.

Lindsay Capmany  
National Catastrophe Team  
Allstate Texas Lloyds  
c/o Roerig, Oliveira & Fisher, L.L.P.  
10225 N. 10<sup>th</sup> Street  
McAllen, Texas 78504  
Ph. (956)393-6300

Lindsay Capmany, claim adjuster for Allstate Texas Lloyds, who has knowledge regarding the facts and circumstances surrounding the happening, incident and/or occurrence made the basis of this suit.

- (B) A copy of, or a description by category and location of, all documents, data compilations, and tangible things in the possession, custody, or control of the party that are relevant to disputed facts alleged with particularity in the pleadings:**

**ANSWER:**

Please see documents bates numbered 000157-000171 (Olivarez, Veronica) which are being produced and documents previously produced bates numbered 000001-000156 (Olivarez, Veronica).

- (C) A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered:**

**ANSWER:**

Plaintiff is entitled to the actual damages resulting from the Defendants' violations of the law. These damages include the consequential damages to economic welfare from the wrongful denial and delay of benefits; the mental anguish and physical suffering resulting from this wrongful denial of benefits, and continued economic impact on the Plaintiff; and the other actual damages permitted by law. In addition, Plaintiff is entitled to exemplary damages.

As a result of Defendants' acts and/or omissions, Plaintiff has sustained damages in excess of the minimum jurisdictional limits of this Court.

Plaintiff is entitled under law to the recovery of statutory and prejudgment interest at the maximum legal rate.

Defendants' knowing violations of the DTPA entitle the Plaintiff to attorneys' fees, treble damages, and other penalties provided by law.

Plaintiff is also entitled to the recovery of attorneys' fees pursuant to Tex. Civ. Prac. & Rem. Code §38.001, the Texas Insurance Code 542.060(a)-(b), the Tex. Bus & Commerce Code §17.50 and Tex. Civ. Prac. & Rem. Code §37.009.

**(D)For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment that be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.**

**ANSWER:**

Not applicable.